

Deeming Status of Required External Quality Review Activities Virginia

All Virginia Medicaid Managed Care Organizations (MCOs) are accredited by the National Committee for Quality Assurance. The MCOs are required by the Virginia Department of Medical Assistance Services (DMAS), the state agency that administers the Medicaid and CHIP programs, to be NCQA accredited. DMAS recognizes the value that NCQA accreditation brings to the overall quality of care provided to the people it serves. DMAS also recognizes the value of efficiencies gained from the ongoing and rigorous accreditation processes that the MCOs experience. The three mandated managed care external quality review activities, as set forth in the Balanced Budget Act, are listed below with a brief explanation on how NCQA accreditation enables the MCOs to automatically meet some of the requirements.

Performance measure validation – not deemed in Virginia

The Department of Medical Assistance Services (DMAS) has been advised by the Centers for Medicare & Medicaid Services (CMS) that this activity cannot be deemed for Virginia. A recently published Medicaid tool-kit states “NCQA’s HEDIS® Compliance Audit process is consistent with the CMS protocol for validating performance measures. Many states, the federal government (CMS and the Office of Personnel Management), and other purchasers, use HEDIS measures for quality improvement, benchmarking and pay for performance.” NCQA further states that *“Financial relationship rules prohibit the state from accepting audited data to meet the federal requirements of validating performance measures when the plan has paid for the audit.”*

Validating performance improvement projects – partially deemed in Virginia

Virginia works collaboratively with the five Medicaid managed care organizations to identify the topics for the performance improvement projects (PIPs). The multi-year topics used for the PIPs validation are well-child visits and childhood immunizations. DMAS recognizes the value of using the related HEDIS measures and the technical specifications for these topics. DMAS has identified, in collaboration with the MCOs, a number of elements of the CMS published protocol for validating PIPs that can be deemed as automatically being met as a result of the MCOs adhering to the HEDIS technical specifications for the related measures. Prior to July 1, 2007, none of the PIPs validation activities were deemed in Virginia.

Operational systems review – partially deemed in Virginia

The most recent round of operational systems reviews (OSR) was completed by the EQRO in calendar year 2008 and did not allow for deeming. OSR is the term used by DMAS to reference the “regulatory compliance monitoring” requirement set forth in the BBA. The next round of OSRs, which is scheduled for 2011, will enable partial deeming for those elements that duplicate NCQA requirements of the MCOs. DMAS plans to have the EQRO conduct the OSR and allow for deeming of those elements that duplicate NCQA accreditation requirements.